



THE BALDOCK SOCIETY

www.baldocksociety.org.uk

c/o 1 Norton Road, Baldock, Hertfordshire, SG7 5AP

NORTH HERTFORDSHIRE LOCAL PLAN 2011-2031: PREFERRED OPTIONS CONSULTATION

Representations submitted on behalf of the Baldock Society

The Society wishes to make the following representations:

Name or part of document: **The plan as a whole**

Nature of representation: **Object**

Reasons:

We object to the draft plan as a whole because it does not provide a clear, concise and effective framework for managing development, for the following reasons:

1. It fails to make use of generic, criteria-based policies at the start of the document that could eliminate unnecessary repetition of basic material considerations elsewhere in the plan (e.g. in policies ETC5, D3).
2. Many of the policies contain vague phrases like “The Council is supportive of” (ETC4) or “where appropriate” (D1, NE2).
3. The supporting text is unnecessarily long.

Name or part of document: **Introduction**

Nature of representation: **Comment**

Reasons:

The evidence base for the plan contains critical gaps, especially in relation to the extent of the highways network covered by the strategic highways modelling, the failure to model the highways impacts of development sites (especially the proposed strategic sites) and the lack of viability modelling for the strategic housing sites. This comment is expanded upon in the context of our objections to the proposals for Baldock.

Name or part of document: **Vision and objectives**

Nature of representation: **Object**

Reasons:

We object to the vision and objectives, as they fail to provide an imaginative and compelling vision for the future of North Hertfordshire and its communities. The ‘vision’ is almost entirely lacking, both

in this section of the plan and in the sections on each community. The draft plan reads as a sterile exercise in finding land to accommodate identified development needs, rather than explaining how this scale of change is expected to shape the nature and role of North Hertfordshire's communities, and what (if any) positive opportunities this might create.

Name or part of document: ETC1 (Provision and distribution of employment land)

Nature of representation: Object

Reasons:

We object to this policy because it allocates employment land at Baldock to meet the needs of Stevenage, rather than identifying opportunities for additional growth adjacent to Stevenage itself. We reject the argument at paragraph 3.12 that it is "more sustainable" to cater for the unmet employment land requirements of Stevenage at Baldock, rather than adjacent to Stevenage. Any increase in employment land at Baldock should be commensurate with the scale of growth in the town and established commuting patterns.

Name or part of document: CGB1 (Green Belt)

Nature of representation: Object

Reasons:

We object to this policy because the proposed extension of the Green Belt is not properly justified and could reduce opportunities to accommodate necessary development outside the Green Belt. None of the areas proposed to be added to the Green Belt have been assessed in the Council's Green Belt Review as making a significant contribution to Green Belt purposes, and the Council has failed to explain – as the National Planning Policy Framework requires – why normal countryside protection policies do not provide an adequate level of protection for the areas concerned.

Name or part of document: HDS1 (Housing targets and distribution)

Nature of representation: Object

Reasons:

We object to this policy because:

1. The Council has not explained sufficiently clearly its interpretation of paragraph 14 of the National Planning Policy Framework, in relation to the extent to which the Green Belt in the district may be considered to limit the extent to which identified needs must be met in full.
2. It is not clear that the Council has worked in a sufficiently proactive way with landowners and neighbouring councils to identify potentially available and suitable sites outside the Green Belt; in particular to explore the feasibility of a new settlement at Odsey.
3. The draft plan and background papers provide insufficient explanation of why some suitable and available sites have not been allocated in preference to those that are contained in the plan: in particular the option of additional growth at Hitchin through SHLAA sites 209E (1028 homes), 219 and 220 (St Ippolyts – 95 homes in total); and at Knebworth (SHLAA sites 55, 57, 58 and 211 – 375 homes in total).
4. The land west of the A1(M) at Stevenage should be considered as capable of contributing to North Hertfordshire's housing requirement, rather than being kept as a reserve site to meet any unmet needs arising from Stevenage. This is because of the single housing market area, commuting flows into Stevenage and the longer-term opportunities that exist for integrating this area more fully into the surrounding road network. The Housing and Settlement Hierarchy Background Paper makes clear (at paragraph 4.18) that Stevenage and surrounding parts of North Hertfordshire form part of one housing market area, while paragraph 3.12 of the draft plan notes that continued commuting growth from North Hertfordshire to Stevenage is anticipated.

Consequently this land could make a useful contribution to meeting North Hertfordshire's identified needs towards the end of the plan period. Paragraphs 4.38 and 4.39 of the Housing and Settlement Hierarchy Background Paper acknowledge that the area is still being promoted, so it remains deliverable. While infrastructure improvements are required, these appear to be no greater than those needed for other proposed urban extensions such as that at Baldock.

Name or part of document: HDS4 (Density)

Nature of representation: Object

Reasons:

We object to this policy because it fails to provide a clear basis for determining appropriate densities in different locations: the policy is vague and contains unhelpful and unclear caveats ("generally" and "may be appropriate in principle").

Name or part of document: D1 (Design)

Nature of representation: Object

Reasons:

We object to this policy because it fails to provide a clear basis for encouraging and securing good design: the wording is vague ("should where appropriate", "consider", "this list is illustrative"), and leaves too much to a supplementary Planning Document that carries less weight.

Name or part of document: HE1 (Heritage Strategy)

Nature of representation: Object

Reasons:

We object to this policy because:

1. It fails to provide a clear and concise strategy for conserving and enhancing the historic environment in North Hertfordshire, especially in those locations where major change is anticipated (such as Baldock);
2. The criteria for assessing proposals to demolish non-listed buildings are extremely unclear (the final part of the policy is almost impossible to follow) and refer to an undefined concept of "positive" building.

Name or part of document: ID2 (Masterplans)

Nature of representation: Comment

Reasons:

Much of the work identified as being delegated to masterplans needs to be addressed ahead of the local plan being finalised, rather than left until the plan is adopted. In particular, the level of infrastructure and facilities required to support these developments, their impact on the natural and historic environment, and their relationship to existing communities need to be understood and addressed before the sites are allocated.

Name or part of document: Baldock

Nature of representation: Object

Reasons:

We object to the scale of development proposed for Baldock, for the following reasons:

1. The scale of development proposed is wholly disproportionate to the size of the town, its development needs and those of neighbouring settlements.

2. Development on this scale at Baldock would be poorly-related to the major centres of existing population and economic activity within and adjacent to North Hertfordshire, and so would be likely to add significantly to commuting flows.
3. We believe there would be a significant adverse impact on the highways network within and around Baldock, which the Council has failed to assess or address in terms of options for mitigation. The national Planning Practice Guidance sets out the transport evidence base that should inform plan-making, most of which is lacking in the work carried out to inform the draft plan. The transport modelling carried out by AECOM fails to cover key routes through the town, and there has been no attempt to model the likely pattern of trip generation and its distribution through Baldock. One consequence is that there is no evidence that this scale of growth is actually deliverable, as required by the tests of soundness at paragraph 182 of the National Planning Policy Framework.
4. The increased traffic flows that would be the inevitable result of this scale of development would harm the character and appearance of the town, including its conservation area and many listed buildings, as well as having an adverse impact on residents' living conditions. The Infrastructure Delivery Plan produced by the Council acknowledges that "Baldock is particularly unsuited to high levels of traffic, especially through the narrowest roads of the historic town centre" (para. 22.51), but the scale of growth now being proposed for the town completely disregards this.
5. The scale of development proposed would also harm the social character of the town, which stems in part from its compact size and the fact that one secondary school serves the whole town.
6. The draft plan lacks any vision of how the proposed development sites and scale of growth could be integrated effectively into the rest of the town, or what they would mean for its overall character and appearance.

Name or part of document: Proposed site BA1 (Blackhorse Farm)

Nature of representation: Object

Reasons:

While the Baldock society does not wish to express a view on the individual development sites proposed for the town, it makes an exception for this site, to which we object for the following reasons:

1. The scale of development proposed for this site is wholly disproportionate to the size of the town, its development needs and those of neighbouring settlements.
2. There would be a significant adverse impact on the highways network within and around Baldock, which the Council has failed to assess or address in terms of options for mitigation.
3. The Council has failed to provide sufficient evidence of the infrastructure needed to deliver this site, to show how it could be integrated with the rest of the town, or to demonstrate its viability.
4. There would be a significant detrimental landscape impact. The Landscape Sensitivity Study prepared by Land Use Consultants for the Council (2013) shows that much of the proposed allocation would be in areas of moderate to high landscape sensitivity, and recommended that only 22 hectares had potential for residential use – significantly less than the 138 hectares proposed for allocation by the Council. This size of allocation therefore flies in the face of the Council's own evidence base. Of particular concern is the fact that the anticipated line of the access road would follow a prominent ridge, while the extended area included to gain access to the Baldock bypass (site D in the SHLAA update) would have the effect of joining Baldock to Bygrave, and so erode one of the key purposes of the Green Belt.
5. Insufficient evidence has been provided to demonstrate that there would not be an unacceptable impact on surface water run-off and flood risk, water supply, water quality and the biodiversity value of the adjacent Ivel Springs Local Nature Reserve.

Name or part of document: West of A1(M) at Stevenage

Nature of representation: Object

Reasons:

We object to this policy because the land to the west of Stevenage should be allocated for development in the current plan period, and make a contribution to meeting North Hertfordshire's identified housing needs, rather than being retained as a reserve site for possible future use.

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